

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BIGFOOT 4x4, INC.)	
)	
)	
Plaintiff,)	
v.)	Case No.: 22-cv-6758
)	
)	Judge LaShonda A. Hunt
The Individuals, Corporations, Limited)	
Liability Companies, Partnerships, and)	Magistrate Judge Jeffrey T. Gilbert
Unincorporated Associations Identified on)	
Schedule A Hereto)	
)	
Defendants.)	

**DAOEN DEFENDANTS' ITEMIZATION OF FEES BEING REQUESTED IN MOTION
FOR COSTS, EXPENSES, AND FEES (DKT. #69)**

On August 15, 2023, this Court granted the Daoen Defendants'¹ Motion to Compel Responses to Discovery Requests and for Fees (Dkt. #99). (Dkt. #123.) In so doing, the Court asked the Daoen Defendants to file an itemization of fees being requested in their motion and also an itemization of the fees being requested in a previously filed Motion for Costs, Expenses, and Fees (Dkt. #69) related to the Daoen Defendants having to move to compel service of certain sealed documents (Dkt. #50). Accordingly, the Daoen Defendants request that the following fees² related to the preparation of their Motion to Compel Service of Sealed Documents (Dkt. #50) and their Motion for Costs, Expenses, and Fees (Dkt. #69) be paid:

¹ "Daoen Defendants" refers to Shenzhen Daoen Model Technology Co., Ltd.; Shenzhen Aoxinfa Technology Co., Ltd.; and Shenzhen Tianqinli Technology Co., Ltd.

² The itemization of fees reflects the fees billed in connection with the Daoen Defendants' preparation of their Motion to Compel Service of Sealed Documents (Dkt. #50) and Motion for Costs, Expenses, and Fees (Dkt. #69). (Ex. A, Alexander Declaration.)

Motion to Compel Service of Sealed Documents (Dkt. #50)				
Attorney	Hourly Rate	Hours	Description of Services	Total
John Reulbach (Senior Attorney)	\$425	15.6	Legal research related to compelling service of sealed filings; preparation of first draft of motion and memorandum in support.	\$6,630.00
Andrew Alexander (Junior Partner)	\$510	9.4	Preparation of final draft of motion and memorandum in support.	\$4,794.00
Todd Tucker (Senior Partner)	\$880	7.7	Final review and analysis of motion and memorandum in support; further revisions to memorandum in support.	\$6,776.00
				Total: \$18,200.00
Motion for Costs, Expenses, and Fees (Dkt. #69)				
John Reulbach (Senior Attorney)	\$425	9.7	Legal research related to legal authority for awarding fees for party withholding sealed documents; preparation of first draft of motion and memorandum in support.	\$4,122.50
Andrew Alexander (Junior Partner)	\$510	17	Legal research related to awarding fees under Section 1927; preparation of final draft of motion and memorandum in support; preparation of final draft of reply brief in support.	\$8,670.00
Todd Tucker (Senior Partner)	\$880	2.3	Final review and analysis of motion, memorandum in support, and reply brief in support.	\$2,024.00

				Total: \$14,816.50
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Date: August 30, 2023

Respectfully submitted,

/s/ Todd R. Tucker

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Technology Co., Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2023, the foregoing was served upon counsel of record by virtue of the Court's electronic filing system.

/s/ Todd R. Tucker
One of the attorneys for Defendants